

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

POWER INTEGRATIONS, INC.,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., and FAIRCHILD
SEMICONDUCTOR CORPORATION

Defendants.

Civil Action No. 04-1271-JJF

**Supplemental Declaration of Richard C. Wingate,
General Counsel of LG Electronics U.S.A., Inc.**

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I, Richard C. Wingate, declare as follows:

I am employed by LG Electronics U.S.A., Inc. ("LGE-USA"), where I hold the position of General Counsel. I submit this supplemental declaration in support of LG Electronics U.S.A. Inc.'s Reply to Power Integrations' Opposition to LG Electronics U.S.A., Inc.'s Motion to Quash Subpoena Ad Testificandum and for a Protective Order. The statements made herein are based upon my personal knowledge, and if called on as a witness, I would testify as to the following:

1. On November 18, 2005, Power Integrations, Inc. ("Power Integrations") filed an Opposition to LG Electronics U.S.A., Inc.'s Combined Objections and Motion to Quash and Motion for a Protective Order ("Opposition").

2. Power Integrations' Opposition alleges that LGE-USA has information about component suppliers "to ensure subcontractors' compliance with a host of U.S. environmental and other regulations and/or to address problems with defective components." Opp. at 3. This allegation is incorrect. LGE-USA satisfies environmental and other regulations with data pertaining to "LG numbers." LGE-USA addresses defective components with "LG numbers."

3. Power Integrations also alleges that LGE-USA "has at least a contractual right to get . . . information from LG-Korea." Opp. at 2 n.1. LGE-USA is not aware of any such contract.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of November 2005, at Englewood Cliffs, NJ



Richard C. Wingate

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of November, 2005, the attached **SUPPLEMENTAL DECLARATION OF RICHARD C. WINGATE, GENERAL COUNSEL OF LG ELECTRONICS U.S.A., INC.** was served upon the below-named counsel of record at the address and in the manner indicated:

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/s/ Steven J. Balick

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